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October 27, 2021

Via ECF Only

Honorable Vernon S. Broderick
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY. 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 10/31/2021

Sentencing in this matter is adjourned to
December 15, 2021 at 10:00 a.m.

Re: U.S. v. Haniel Saldana.
Case 21-cr-0096-002 (VSB)

Your Honor,

My office represents Mr. Saldana, a defendant in the above referenced matter. The final Probation Report has not yet been provided to my office and my office is still working on gathering materials and producing our sentencing submissions. Because of COVID restrictions it has been difficult finding sufficient time to time to help my client organize his statement to the Court. I write on behalf of my client, to **respectfully request a postponement of the sentencing hearing until after November 27, 2021 and an extension of time for the Defense to file our sentencing submissions.** I have conferred with the counsel for the Government and they agree to the proposed extension of time.

Counsel further agrees and requests that time, pursuant to the Speedy Trial Act, be excluded until the adjourned conference date set by the Court. The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

Michael D. Horn.
Michael D. Horn, Esq.
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cc: AUSA Ni Qian (via ECF)
All Defense Counsel (via ECF)